

REMARKS

Applicants have carefully reviewed the Application in light of the Office Action mailed July 14, 2005, 2005. At the time of the Office Action, Claims 1-22 were pending in the Application. Applicants amend Claims 1, 8, 15, and 22. Applicants respectfully request reconsideration of the pending claims and favorable action in this case.

Section 102 Rejection

The Examiner rejects Claims 1-4, 6-11, 13-18, and 20-22 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,915,285 issued to Gray et al. (hereinafter "*Gray*"). Applicants respectfully traverse this rejection for the following reasons. As amended, Claim 8 recites:

A system for providing telecommunication service comprising:
a double agent, operable to generate a processing event from an incoming call request and store the event in an operating space, and further operable to retrieve a processed event from the operating space and forward the incoming call request based on the processed event;
an operating space, operable to store the processing event and operable to store the processed event;
a plurality of rule sets, wherein each rule set comprises one or more rules for processing the incoming call request; and
a processing agent operable to:
retrieve the processing event from the operating space;
identify a rule set associated with the processing event;
generate a processed event based on the identified rule set; and
store the processed event in the operating space.

Gray fails to recite, either expressly or inherently, every element of Claim 8 for at least several reasons. First, *Gray* fails to disclose "an operating space operable to store the processing event and operable to store the processed event." Second, *Gray* fails to disclose a double agent operable to "generate a processing event from an incoming call request . . . and further operable to retrieve a processed event from the operating space and forward the incoming call request based on the processed event." Second, *Gray* fails to disclose "a processing agent operable to retrieve the processing event; . . . generate a processed event based on the identified rule set; and store the processed event in the operating space." Thus, as described further below, *Gray* fails to recite, either expressly or inherently, every element of amended Claim 8.

First, *Gray* fails to disclose “an operating space operable to store the processing event and operable to store the processed event.” At the outset, Applicants respectfully note that the Examiner fails to identify specific elements of *Gray* that the Examiner equates with the claim limitations of Claim 8 citing, in some instances, nearly a column-and-a-half of text that describes various aspects of the event-based system disclosed by *Gray*. Moreover, Applicants respectfully note that “[w]hen a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable.” 37 C.F.R. § 1.104(c)(2). If the Examiner continues to rely on the cited portions of *Gray* to reject any of the claims of this Application, Applicants respectfully request that the Examiner specifically identify the elements of the system of *Gray* that the Examiner equates with the individual limitations of Claim 8.

Nonetheless, *Gray* does not disclose “an operating space operable to store the processing event and operable to store the processed event.” The portion of *Gray* cited by the Examiner states only that:

When an event occurs, all of the agents that have been registered for the event are informed. If all of the preconditions that are associated with that event are realized, the agent will suggest an action. If not, the agent will reply with “No Action”. The arbitrator waits until it receives a reply from all of the agents registered to handle the event. If more than one agent replies to the event, the arbitrator detects the conflict and intervene so that only one action is chosen. If no agent is registered to handle an event, or if all of the agents reply by a “No Action”, the vent is automatically removed and the arbitrator agent is notified (to accommodate the possibility of the occurrence of a state that was not taken into consideration during the design of the system).

Col. 4, ll. 33-44.

Nothing in the cited portion however relates to an “operating space operable to store a processed event and operable to store a processing event.” In fact, the cited portion does not make any reference to the storage of any types of events. Thus, *Gray* fails to disclose “an operating space operable to store the processing event and operable to store the processed event.”

Second, *Gray* fails to disclose a double agent operable to “generate a processing event from an incoming call request . . . and further operable to retrieve a processed event from the operating space and forward the incoming call request based on the processed event.” As

noted above, the Examiner fails to identify the specific elements of *Gray* that the Examiner equates with the limitations of Claim 8. Nonetheless, to the extent the Examiner may be equating the claimed “double agent” to the “Agent B” described in the cited portion of *Gray*, “Agent B” merely receives a call request from a device-agent of “Caller A” (Col 9, ll. 8-10), and then chooses to forward the associated call based on policies available to “Agent B.” Col. 9, ll. 26-ll. 43. Moreover, the cited portion of *Gray* does not disclose any form of operating space. Thus, “Agent B” does not “generate a processing event from an incoming call request” and does not “retrieve a processed event from the operating space” as recited by Claim 8.

Third, *Gray* fails to disclose “a processing agent operable to retrieve the processing event; . . . generate a processed event based on the identified rule set; and store the processed event in the operating space. Again, as noted above, the Examiner fails to identify the specific elements of *Gray* that the Examiner equates with the limitations of Claim 8. Nonetheless, to the extent the Examiner may be attempting to equate “Agent B” with the processing agent in rejecting Claim 8, “Agent B” merely receives a call request from a device-agent of “Caller A” (Col 9, ll. 8-10), and then chooses to forward the associated call based on policies available to “Agent B.” Col. 9, ll. 26-ll. 43. Moreover, the cited portion of *Gray* does not disclose any form of operating space. Thus, “Agent B” does not “retrieve the processing event; . . . generate a processed event based on the identified rule set; and store the processed event in the operating space” as recited by Claim 8.

Thus, *Gray* fails to recite, either expressly or inherently, every element of Claim 8. Claim 8 is thus allowable for at least these reasons. Applicants respectfully request reconsideration and allowance of Claim 8 and its dependents.

Although of differing scope from Claim 8, Claims 1, 15, and 22 include elements that, for reasons substantially similar to those discussed with respect to Claim 8, are not disclosed by the cited reference. Claims 1, 15, and 22 are thus allowable for at least these reasons. Applicants respectfully request reconsideration and allowance of Claims 1, 15 and 22.

Section 103 Rejection

The Examiner rejects Claims 5, 12, and 19 under 35 U.S.C. §103(a) as being unpatentable over *Gray* in view of U.S. Publication No. 2004/0083479 issued to Bondarenko et al. (hereinafter “*Bondarenko*”). Applicants respectfully traverse this rejection for the following reasons. Claims 5, 12, and 19 depend from Claims 1, 8, and 15, respectively, which have all been shown above to be allowable. Claims 5, 12, and 19 are thus allowable for at least these reasons. Applicants respectfully request reconsideration and allowance of Claims 5, 12, and 19.

Thus, *Gray* fails to recite, either expressly or inherently, every element of amended Claim 8. Claim 8 is thus allowable for at least this reason. Applicants respectfully request reconsideration and allowance of Claim 8 and its dependents.

Although of differing scope from Claim 8, Claims 1 and 15 include elements that, for reasons substantially similar to those discussed with respect to Claim 8, are not disclosed by the cited reference. Claims 1 and 15 are thus allowable for at least these reasons. Applicants respectfully request reconsideration and allowance of Claims 1 and 15, and their respective dependents.

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CONCLUSION

Applicants have now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for all other reasons clear and apparent, Applicants respectfully request reconsideration and allowance of the pending claims.

Applicants believe no fee is due. However, if this is not correct, the Commissioner is hereby authorized to charge any additional amount required or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

If there are matters that can be discussed by telephone to advance prosecution of this application, Applicants invite the Examiner to contact Todd A. Cason at 214.953.6452.

Respectfully submitted,
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